

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Nelson Knitting - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Nelson Knitting
C5RT
Rockford, IL
Latitude: 42.2638342 Longitude: -89.1018692

To: Sam Borries, U.S. EPA
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Eric Setter, Winnebago County

From: Robert Kondreck & Colin Hendrickson, On-Scene Coordinators

Date: 3/24/2023

Reporting Period:

1. Introduction

1.1 Background

Site Number:	C5RT	Contract Number:	
D.O. Number:		Action Memo Date:	11/30/2022
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/30/2023	Start Date:	1/30/2023
Demob Date:	3/1/2023	Completion Date:	3/8/2023
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Incident Category: Inactive Production Facility

1.1.2 Site Description

The former Nelson Knitting Site is located in Rockford, Winnebago County, Illinois. The Site formerly operated as a sock knitting mill from 1926 to 1990 and then was mostly unused from 1990 to present. The current owner of the Site is Winnebago County who purchased the property through tax delinquency on October 17, 2022.

The Site consists of one parcel of land and is approximately 2 acres in size. The Site consists of a dilapidated three-story industrial building with a collapsing roof. The City of Rockford elected to condemn and secure the Site in June 2020; however, trespassers have continued to manage to enter the building. Site assessments by the city and EPA have found evidence of scrapped building materials and friable asbestos debris littered on the floor. Additionally, the Site contains PCB lighting ballasts, lead acid batteries, miscellaneous chemicals, mercury switches, and fluorescent light tubes.

1.1.2.1 Location

The Site is located at 909 S. Main Street, Rockford, Winnebago County, Illinois 61101. The geographic coordinates of the Site are 42.263834 North and -89.101958 West. The Site occupies approximately 2 acres in the southwestern portion of the city. The Site encompasses one parcel of land and is zoned for industrial use. The property is bordered to the north by a wooded lot owned by the Rockford Park District; to the east by an operating commercial warehouse and office space; to the south by an open lot; and to the west by the Tinker Swiss Cottage Museum Campus owned by the Rockford Park District. A residential neighborhood is located approximately 300 feet southwest of the Site. There is an elementary school 0.5 mile from the Site, public housing less than a quarter mile from the Site, and the Winnebago County jail 0.6 miles from the Site.

1.1.2.2 Description of Threat

A release or threat of release of hazardous substances, pollutants, or contaminants is present at the Site. Based on available data, the hazardous substances, as defined by Section 101(14) of CERCLA, present is primarily asbestos. Asbestos is designated as a hazardous substance under CERCLA at 40 C.F.R. § 302.4 and has been determined to be a human carcinogen by EPA. Other hazardous substances listed under 40 C.F.R. § 302.4, or pollutant or contaminants include PCB lighting ballasts, lead acid batteries, miscellaneous chemicals, mercury switches, and fluorescent light tubes. The presence of asbestos at the Site has been documented by the analysis of samples collected from asbestos thermal system insulation debris found on the floor. As the roof continues to slowly collapse, ACM debris will be increasingly vulnerable to weathering and further degradation. The Site has remained largely unsecured and is subject to frequent trespassing and vandalism. Trespassing individuals are exposed to the asbestos debris and can potentially transport the ACM outside of the Site.

Approximately 12,204 people live within one mile of the Site. An Environmental Justice (EJ) analysis was conducted for the Site. Screening of the surrounding area was performed using Region 5's EJ Screen Tool. Region 5 has reviewed environmental

and demographic data for the area surrounding the Site at 909 S. Main St., Rockford, Winnebago County, Illinois and determined there are multiple variables above 80%.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 31, 2008, Fehr-Graham & Associates completed a Phase I Environmental Site Assessment that identified the following environmental risks at the Site: deteriorated suspect ACM pipe insulation, suspected lead-based paint on surfaces, containers of miscellaneous chemicals ranging in size from a few ounces to 55 gallons, mercury-containing fluorescent lamps, suspected PCB-containing fluorescent lamp ballasts and electrical capacitors.

On July 10, 2020, the IEPA referred Nelson Knitting to the EPA and requested an OSC be assigned to the Site to evaluate the Site for a time-critical removal action. Illinois EPA documented hazards at the Site, including suspect friable asbestos released to the environment, and did not believe the owner had sufficient financial resources to address the Site.

On October 8, 2020, an OSC and START contractors conducted a Site Assessment. Eleven ambient air samples (interior and exterior) and seven bulk samples were collected for ACM analysis. All eleven air samples were found to have concentrations below the Occupational Safety and Health (OSHA) Permissible Exposure Limit (PEL) of 0.1 fibers per cubic centimeters. Bulk samples from seven suspect ACMs were collected at the Site from four areas disturbed by recent activity in the building. Of the seven sampled building materials, three samples were identified as friable and tested positive to contain asbestos concentrations above one percent.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Reporting period for 3/3/2023 to 3/8/2023

2.1.2 Response Actions to Date

During this reporting period, the following activities took place:

-All PCB ballasts, fluorescent light tubes, mercury switches, and lead acid batteries were hauled off-site by Veolia for disposal.

Particulate Air Monitoring:

Background particulate monitoring and several background asbestos samples were collected prior to asbestos removal. Personnel asbestos air sampling was completed during asbestos debris removal per applicable OSHA regulations. Outdoor particulate monitoring and asbestos sampling was conducted when asbestos was being removed from the building.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Site is currently owned by Winnebago County. Enforcement activities on PRPs are ongoing.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Fluorescent Light Tubes	Solid	(5) 8-ft containers (1) 4-ft container	ZZ01187017	N/A	Veolia
Lead Acid Battery	Solid	(2) 5-gallon containers	ZZ01187017	N/A	Veolia
Mercury Switches/Thermometer	Solid	(1) 5-gallon container	002124985VES	N/A	Veolia
PCB Light Ballasts	Solid	(2) 55-gallon Drums	002124985VES	N/A	Veolia
ACM Debris	Solid	(10) 20-cuyd roll-offs	TBD	N/A	Rock River Disposal

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	N/A
	Cubic yards of contaminated sediments removed and/or capped	N/A
	Gallons of oil/water recovered	N/A
	Acres of soil/sediment cleaned up in floodplains and riverbanks	N/A
Stand Alone Assessment	Number of contaminated residential yards cleaned up	N/A
	Number of workers on site	N/A
Contaminant(s) of Concern	Asbestos, Hg switches, Hg light bulbs, PCB ballast, batteries	
Oil Response Tracking		
Estimated volume	Initial amount released	N/A

			Final amount collected	N/A
CANAPS Info			FPN Ceiling Amount	N/A
			FPN Number	N/A
			Body of Water affected	N/A
Administrative and Logistical Factors (Place X where applicable)				
	Precedent-Setting HQ Consultations (e.g., fracking, asbestos)		Community challenges or high involvement	Radiological
	More than one PRP		Endangered Species Act / Essential Fish Habitat issues	Explosives
	AOC		Historic preservation issues	Residential impacts
	UAO		NPL site	Relocation
	DOJ involved		Remote location	Drinking water impacted
	Tribal consultation or coordination or other issues		Extreme weather or abnormal field season	X Environmental justice
	Statutory Exemption for \$2 Million		Congressional involvement	High media interest
X	Hazmat Entry Conducted – Level A, B or C		Statutory Exemption for 1 Year	Active fire present
			Incident or Unified Command established	Actual air release (not threatened)
Green Metrics				
Metric		Amount		Units
Diesel Fuel Used		469.83		gallons
Unleaded Fuel Used		230.74		gallons
Alternative/E-85 Fuel Used		N/A		gallons
Electricity from electric company		N/A		kWh
Electric Company Name and Account #		N/A		
Electricity from sources other than the electric company		6.080 (Solar)		kWh
Solid waste reused				
Solid waste recycled		(11) Hg switches, (1) Hg thermometer (2-55gallon drums PCB ballast), (4) batteries, (500) light bulbs		
Water Used		Used accumulated water onsite		gallons

2.2 Planning Section

2.2.1 Anticipated Activities

This is the final PolRep. No further on-site activities are planned.

2.2.1.1 Planned Response Activities

- Develop and implement a site Health and Safety Plan, a Site Emergency Contingency Plan, an Air Monitoring/Sampling Plan, and develop measures to control ACM dust during the removal;
- Develop and implement a Site Security Plan;
- Delineate the extent of all solid waste materials which may be found on Site; delineate and determine the extent of asbestos found on Site;
- Characterize and segregate, when possible, ACM waste from waste not containing ACM;
- Load, transport and dispose of ACM, identified hazardous substances, pollutants, ACM impacted wastes, or contaminants at an EPA-approved disposal facility in accordance with the EPA Off-site Rule (40 C.F.R. § 300.440);
- Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant listed in this Action Memo that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

2.2.1.2 Next Steps

This is the final PolRep. No further on-site activities are planned.

2.2.2 Issues

None.

2.3 Logistics Section

The ERRS RM is performing site logistics.

2.4 Finance Section

2.4.1 Narrative

See table below for current budget information:

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$275,000.00	\$180,000.00	\$95,000.00	34.55%
TAT/START	\$35,000.00	\$32,400.00	\$2,600.00	7.43%
Intramural Costs				
Total Site Costs	\$310,000.00	\$212,400.00	\$97,600.00	31.48%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA OSC will be serving as the Safety Officer.

2.5.2 Liaison Officer

Not applicable.

2.5.3 Information Officer

Macy Pressley will be serving as the PIO.

3. Participating Entities

3.1 Unified Command

Not applicable

3.2 Cooperating Agencies

Illinois Environmental Protection Agency
City of Rockford (Brownfields and Parks)
Winnebago County Trust

4. Personnel On Site

(5) ERRS (EQM) - 1.5 operator, 2.5 laborers, 1 RM
(1) START (Tetra Tech) - 1 primary START
(2) OSC

5. Definition of Terms

ACM - Asbestos Containing Materials
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
EJ - Environmental Justice
EPA - US Environmental Protection Agency
ERRS - Emergency and Rapid Response Service Contractor
IEPA - Illinois Environmental Protection Agency
NCP - National Contingency Plan
NPL - National Priorities List
OSC - On-Scene Coordinator
PCBs - Polychlorinated Biphenyls
PolRep - Pollution Report
PRP - Potentially Responsible Party
RM - Response Manager
START - Superfund Technical Assessment & Response Team

6. Additional sources of information

6.1 Internet location of additional information/report

response.epa.gov/nelsonknitting

6.2 Reporting Schedule

All on-site activities have been completed and no further PolReps will be submitted.

7. Situational Reference Materials

No information available at this time.